

REMARKS

This Amendment is responsive to the Official Action mailed on September 18, 2003. The Office Action rejected claims 23 and 26 35 U.S.C. 102(b) as being anticipated by Harari et al. (U.S. patent number 5,418,752) and 35 U.S.C. 102(a) as being anticipated as being anticipated by the MultiMediaCard System Specification Version 1.4, MMCA Technical Committee, and rejected claims 17-22 and 24-25 under 35 U.S.C. 103(a) as being unpatentable over Harari in view of the MultiMediaCard System Specification Version 1.4, MMCA Technical Committee. For the reasons given below, it is respectfully submitted that these rejections are not well founded.

The Office Action also objected to claim 26. The Applicants thank the Examiner for noting the error in claim 26, which has now been amended to conform to the remarks of the Office Action.

Concerning the rejections, claims 17-26 are either rejected under 35 U.S.C. 102(a) as being anticipated by the MultiMediaCard System Specification Version 1.4, MMCA Technical Committee, or rejected under 35 U.S.C. 103(a) with the MultiMediaCard System Specification Version 1.4 as a secondary reference. A Declaration under 37 CFR 1.132 is included with this Amendment and states that the relevant portions of "The MultiMediaCard System Specification" of the MMCA Technical Committee, Version 1.4, are a publication of the applicants'n own invention. As such, the material is not applicable as prior art under 35 U.S.C. 102(a) and the rejection of claims 17-26 is accordingly traversed as "the invention was not known or used by *others* ... before the invention thereof by the applicant for patent", in the language of 35 U.S.C. 102(a) (emphasis added).

Claims 23 and 26 are also rejected 35 U.S.C. 102(b) as being anticipated by Harari et al. (U.S. patent number 5,418,752). Independent claim 23 includes the limitations

a plurality of group tags ... indicating whether the memory cells under the corresponding memory group are *write protected*;

where the emphasis has been added. This is described in the application mainly beginning line 15 of page 52. As described on page 52, lines 25-28:

the group write protection mechanism, before each write request to a WP_GROUP, tests the corresponding tag bit line of the WP_GROUP to determine whether the specific WP_GROUP is write protected. If the addressed group is write protected, the write request will be denied.

Thus, claim 23 is drawn to *protecting* a group from writing. This is quite distinct from the teachings of Harari.

As described in the cited location of Harari (column 6, lines 41-46), the teachings of Harari are related to *enabling* an *erase* process:

...after all sectors intended for erase have been tagged, the controller *initiates an erase cycle to erase the group of tagged sectors*. ... [T]he controller shifts in a global command called Enable Erase into each Flash EEPROM chip that is to perform an erase.

As the added emphasis shows, this process relates to erasing and the enabling of sectors for an erase process.

Thus, in distinction to Harari, claim 23 is drawn to a *write* process, not an *erase*, and is about *protecting* groups of cells for this process, not *enabling* them. Consequently, it is respectfully submitted that claim 23 differs from the teachings of Harari in significant ways and that a rejection under U.S.C. 102(b) as being anticipated by Harari et al. (U.S. patent number 5,418,752) is not well founded and should be withdrawn.

Therefore, for any of the above reasons it is respectfully submitted that a rejection of claims 17-26 under the stated reasons is not well founded and should be withdrawn. Reconsideration of claims 17-26 and an early indication of their allowance are respectfully requested.

Respectfully submitted,



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